

**DICKINSON WRIGHT PLLC**  
Cynthia L. Alexander, Esq.  
Nevada Bar No. 6718  
Email: calexander@dickinson-wright.com  
Taylor Anello, Esq.  
Nevada Bar No. 12881  
Email: tannello@dickinson-wright.com  
8363 West Sunset Road, Suite 200  
Las Vegas, Nevada 89113-2210  
Tel: (702) 550-4400  
Fax: (702) 382-1661

*Attorneys for Plaintiffs U.S. Bank, National Association,  
as Trustee for GSAA 2006-1 and SunTrust Mortgage, Inc.*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

U.S. BANK, NATIONAL ASSOCIATION,  
as Trustee for GSAA2006-1, an Ohio  
Company; SUNTRUST MORTGAGE, INC.,  
a Virginia Corporation

Plaintiffs,

v.

SFR INVESTMENT POOL 1, LLC, a Nevada  
limited liability company; SAN MARINO  
PROPERTY OWNERS ASSOCIATION, a  
Nevada non-profit corporation

Defendants.

CASE NO.: 2:17 cv-01319-JCM-GWF

**STIPULATION AND ORDER TO EXTEND  
DISCOVERY AND TO AMEND  
SCHEDULING ORDER [ECF NO. 30]  
(FIRST REQUEST)**

Pursuant to LR IA 6-1, LR 7-1, and LR 26-4, Plaintiffs U.S. Bank, National Association, as Trustee for GSAA 2006-1 and SunTrust Mortgage, Inc. ("Plaintiffs") through undersigned counsel, the law firm of Dickinson Wright, PLLC, Defendant SFR Investments Pool 1, LLC ("SFR") through undersigned counsel, the law firm of Kim Gilbert Ebron, and Defendant San Marino Property Owners Association ("San Marino"), the law firm Lipson Neilson Cole Seltzer & Garin PC hereby agree and stipulate to extend the case management deadlines as set forth below. This is the parties' first request to extend discovery deadlines.

1     **A.     BACKGROUND STATEMENT AND COMPLETED DISCOVERY:**

2             Plaintiffs filed their Complaint on May 10, 2017 in the United States District Court for the  
3     District of Nevada. On September 12, 2017, the Court entered its initial scheduling order in this case.  
4     (ECF No. 30.) Plaintiffs just recently retained new counsel in this matter and filed the Substitution of  
5     Counsel on February 12, 2018. This is the first request for an extension of the discovery deadlines,  
6     which is limited to a request for an additional sixty (60) days.

7             The following discovery has been completed:

8             Plaintiffs served initial disclosures on September 7, 2017.

9             Defendant SFR served initial disclosures on September 6, 2017.

10            Defendant San Marino served initial disclosures on September 26, 2017.

11            Defendant San Marino has served Plaintiffs with interrogatories, request for production and  
12     request for admission (“San Marino Discovery Requests”) on November 7, 2017. Plaintiffs have  
13     until February 16, 2018 to respond to the San Marino Discovery Requests.

14            Defendant/Counterclaimant SFR served US Bank with interrogatories, request for production  
15     and request for admission (“SFR Discovery Requests”) on February 7, 2018.

16            Defendant/Counterclaimant SFR has noticed the Rule 30(b)(6) Depositions of Plaintiffs for  
17     March 9, 2018. The parties will likely need additional time to schedule the depositions for a  
18     mutually agreeable date.

19     **B.     DESCRIPTION OF DISCOVERY TO BE COMPLETED:**

20            The parties agree that additional time is necessary for the parties to complete discovery in this  
21     case. Plaintiffs’ has recently retained new counsel who will need additional time to review  
22     documents and evaluate the case. Additionally, the parties anticipate that they will take party  
23     depositions and additional written discovery. The parties anticipate being able to schedule and  
24     complete party depositions within the next 90 days, as well as any additional fact witnesses as  
25     deemed necessary based upon documents received in response to subpoena.

26     **C.     PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING**  
27     **DISCOVERY:**

28            The parties agree that an additional 60 days is required to complete discovery, and that new

1 deadlines should begin to run from the existing deadlines:

2 1. **Close of Discovery:**

3 Current Deadline – March 12, 2018

4 Proposed Deadline – **May 11, 2018**

5 2. **Dispositive Motion Deadline:**

6 Current Deadline – April 11, 2018

7 Proposed Deadline – **June 8, 2018**

8 3. **Pretrial Order:**

9 Current Deadline – May 11, 2018

10 Proposed Deadline – **July 6, 2018**

11 In the event that dispositive motions are filed, the date for filing the Joint Pretrial Order shall be  
12 suspended and should be filed thirty (30) days after the decision on the dispositive motions or until  
13 further order of the Court.

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 Good cause exists for this short extension as Plaintiffs' just retained new counsel who needs  
2 additional time to evaluate the case and conduct any necessary discovery. This request is not brought  
3 for the purpose of undue delay.

4 Dated February 14, 2018

Dated February 14, 2018

5 DICKINSON WRIGHT, PLLC

Kim Gilbert Ebron

6 By: /s/ Cynthia Alexander

By: /s/ Diana Ebron

7 Cynthia L. Alexander, Esq.

Diana S. Ebron

8 Nevada Bar No. 6718

7625 Dean Martin Drive, Suite 110

9 Taylor Anello, Esq.

Las Vegas, NV 89139

10 Nevada Bar No. 12881

Phone: (702) 485-3300

8363 West Sunset Road, Suite 200

Fax: (702) 485-3301

Las Vegas, Nevada 89113-2210

*Attorneys for Defendant SFR Investments*

Tel: (702) 550-4400

*Pool 1, LLC*

Fax: (702) 382-1661

*Attorneys for Plaintiffs U.S. Bank, National*

*Association, as Trustee for GSAA 2006-1*

*and SunTrust Mortgage, Inc.*

14 Dated February 14, 2018

15 Lipson Neilson Cole Seltzer & Garin PC

16 By: /s/ Karen Kao

17 Karen Kao

9900 Covington Cross Dr., Ste. 120

18 Las Vegas, NV 89144

702-382-1500

19 *Attorneys for Defendant San Marino*

*Property Owners Association*

21 **IT IS SO ORDERED:**

22  
23   
UNITED STATES MAGISTRATE JUDGE

24 DATED: 2/15/2018

26 LVEGAS 55969-24 203368v1